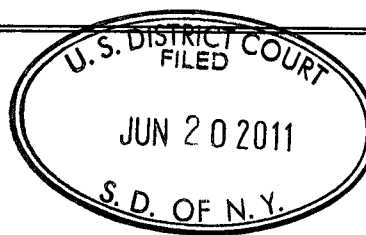


**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**



Arthur R. Cahoon, et al., Plaintiff,

- against -

Bayerische Hypo-Und  
Verinsbank, AG, et al. Defendant.

11 cv 1891 (RMB)

**MOTION TO ADMIT COUNSEL  
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Brian G. Isaacson a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

Applicant's Name: Mark J. Wilson  
Firm Name: Isaacson & Wilson, P.S.  
Address: 1200 Fifth Avenue, Suite 1900  
City/State/Zip: Seattle, WA 98101-3135  
Phone Number: (206) 448-1011  
Fax Number: (206) 448-1022

Mark J. Wilson is a member in good standing of the Bar of the States of Washington and California

There are no pending disciplinary proceeding against Mark J. Wilson in any State or Federal court.

**JUN 16 2011**

Dated:

City, State: Seattle, WA

Respectfully submitted,

Sponsor's  
SDNY Bar IB 8224  
Firm Name: Isaacson & Wilson, P.S.  
Address: 1200 Fifth Ave., Ste. 1900  
City/State/Zip: Seattle, WA 98101-3135  
Phone Number: 206-448-1011  
Fax Number: 206-448-1022

# IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION	)	BAR NO. 16675
	)	
OF	)	<b>CERTIFICATE OF</b>
	)	<b>GOOD STANDING</b>
MARK JEFFREY WILSON	)	
	)	
TO PRACTICE IN THE COURTS OF THIS STATE	)	
	)	

---

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

MARK JEFFREY WILSON

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington on February 18, 1987, and is now and has continuously since that date been an attorney in good standing, with a current status of active.



IN TESTIMONY WHEREOF, I have  
hereunto set my hand and affixed  
the seal of said Court this 8<sup>th</sup> day of  
June, 2011.

Ronald R. Carpenter  
Supreme Court Clerk  
Washington State Supreme Court



# Supreme Court of California

FREDERICK K. OHLRICH

*Clerk of the Court*

**CERTIFICATE OF THE CLERK OF THE SUPREME COURT  
OF THE  
STATE OF CALIFORNIA**

**MARK JEFFREY WILSON**

*I, FREDERICK K. OHLRICH, Clerk of the Supreme Court of the State of California, do hereby certify that MARK JEFFREY WILSON was on the 13th day of January, 1981, duly admitted to practice as an attorney and counselor at law in all the courts of this state, and is now listed on the Roll of Attorneys as a member of the bar of this state in good standing.*

*Witness my hand and the seal of the court  
on the 10th day of June, 2011.*

FREDERICK K. OHLRICH

*Clerk of the Supreme Court*

By: \_\_\_\_\_

A handwritten signature in cursive script, appearing to read "Cahoon", written over a horizontal line.

*Charles Cahoon, Deputy Clerk*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X

**ARTHUR L. CAHOON; et al,**

**Plaintiffs,**

**v.**

**BAYERISCHE HYPO-UND  
VEREINSBANK AG; et al,**

**Defendants.**

-----X

**Case No. 11-cv-01891 RMB**

**[ECF CASE]**

**AFFIDAVIT OF BRIAN G. ISAACSON  
IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE**

State of Washington	§	
	§	ss
County of King	§	

Brian G. Isaacson, being duly sworn, hereby deposes and says as follows:

1. I am a partner with Isaacson & Wilson, P.S., counsel for Plaintiffs in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiffs' motion to admit Mark J. Wilson as counsel pro hac vice to represent Plaintiffs in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in January 2009. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Mark Wilson since January 2002.
4. Mr. Wilson is a partner with Isaacson & Wilson, P.S., in Seattle, Washington.
5. I have found Mr. Wilson to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

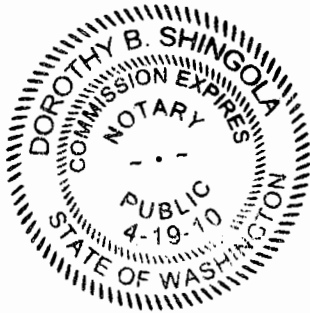
6. Accordingly, I am pleased to move the admission of Mark J. Wilson, pro hac vice.
7. I respectfully submit a proposed order granting the admission of Mark J. Wilson, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Mark J. Wilson, pro hac vice, to represent Plaintiffs in the above captioned matter, be granted.

Dated: **JUN 16 2011**

City, State: Seattle, WA 98101

Notarized: *Dorothy B. Shingola*



Respectfully submitted,

*Brian G. Isaacson*  
\_\_\_\_\_  
Brian G. Isaacson  
SDNY Bar Code: IB 8224

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

---

Arthur R. Cahoon, et al.,                      Plaintiff,

11 cv 1891                      (RMB )

- against -

Bayerische Hypo-Und Verinsbank,                      Defendant.  
AG, et al.

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**ORDER FOR ADMISSION  
PRO HAC VICE  
ON WRITTEN MOTION**

Upon the motion of Brian G. Isaacson                      attorney for (Plaintiff or Defendant's Name)  
and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name:      Mark J. Wilson  
Firm Name:                      Isaacson & Wilson, P.S.  
Address:                      1200 Fifth Avenue, Suite 1900  
City/State/Zip:                      Seattle, WA 98101-3135  
Telephone/Fax:                      (206) 448-1011  
Email Address:                      206-448-1022

is admitted to practice pro hac vice as counsel for (Plaintiff or Defendant's Name)                      in the above  
captioned case in the United States District Court for the Southern District of New York. All attorneys  
appearing before this Court are subject to the Local Rules of this Court, including the Rules governing  
discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall  
immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice  
fee to the Clerk of Court.

Dated:  
City, State: Seattle, WA

---

United States District/Magistrate Judge

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**ARTHUR L. CAHOON, et al,**

**Plaintiffs,**

**v.**

**BAYERISCHE HYPO-UND VEREINSBANK AG; et  
al,**

**Defendants.**  
-----X

**Case No. 11-CV-1891 (RMB)**

**[ECF CASE]**

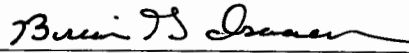
**AFFIRMATION OF SERVICE**

I, Brian G. Isaacson, declare under penalty of perjury that I have served a copy of the attached Motion to Admit Counsel Pro Hac Vice and Affidavit of Brian G. Isaacson in Support of Motion to Admit Counsel Pro Hac Vice upon the following via U.S. Postal Service:

Mark W. Lerner  
Kasowitz Benson Torres &  
Friedman, LLP  
1633 Broadway  
New York, NY 10091

Mark P. Ressler  
Kasowitz Benson Torres &  
Friedman, LLP  
1633 Broadway  
New York, NY 10091

Dated: Seattle, WA  
June 16, 2011

  
\_\_\_\_\_  
Brian G. Isaacson  
ISAACSON & WILSON, P.S.  
1200 FIFTH AVENUE, SUITE 1900  
SEATTLE, WA 98101-3135  
Tel: 206-448-1011  
*Attorney for Plaintiffs*  
NYSD # IB 8224